

Chapter 7

The Client Record

7.1 Authority: 34 CFR 361.40

USOR is required to gather, maintain, and report information on each client/applicant registered with the agency. The data elements shall include, but not be limited to age, sex, race, ethnicity, education, type of disability, significance of disability, key rehabilitation process dates, earnings at the time of entry into the program and at closure, work status, occupation, cost of case services, types of services provided, types of facilities or agencies which furnished services and whether each such facility or agency is public or private, and reasons for closure. (See Chapter 16)

7.2 Policy

USOR policy is to maintain a client record of vocational rehabilitation services which includes, to the extent pertinent, the following information:

- A. If an applicant has been determined to be an eligible individual, documentation supporting that determination.
- B. If an applicant has been determined to be ineligible, documentation supporting that determination in accordance with the requirements of 34 CFR 361.43.
- C. Documentation supporting the determination that an individual has a significant disability or a most significant disability.
- D. If an individual has a disability that is so severe that the situation requires trial work exploration in order to determine whether the individual is an eligible individual, documentation supporting the need for trial work exploration, documentation reporting progress, conclusions and VR Counselor decision. (See Chapter 6)
- E. The IPE, and any amendments to the IPE, containing the information required under Sec 102(b)(3) of the Act as amended.
- F. Documentation of the periodic reviews and evaluations of progress toward achieving the employment outcome.
- G. When the individual obtains competitive employment verification that the individual is compensated at or above the minimum wage and that the individual's wage and level of benefits are not less than that customarily paid by the employer for the same or similar work performed by non-disabled individuals in accordance with 34 CFR 361.5(b)(10)(ii).
- H. Documentation concerning any action and decision resulting from a request by an individual for review of a VR Counselor determination under 34 CFR 361.57.
- I. In the event that an applicant or eligible client requests that information in the client record be amended and the record is not amended, record of the request.
- J. When the client record is closed successful, documentation that the services provided under the IPE contributed to the achievement of the employment outcome and that all provisions under 361.56 have been satisfied.

7.3 Documentation of Client Informed Choice

34 CFR Part 361.47(a)(7) requires the client record documentation to show clients had informed choice throughout the rehabilitation process. This includes but is not limited to exercising informed

choice related to assessment services, options in developing the IPE, selecting the employment outcome, specific services needed to achieve the employment outcome, selecting the service providers, setting and procurement of services.

7.4 Organization and Content of USOR Client Record - General

Maintaining client records that have clear, concise and consistent documentation is imperative in assuring compliance with federal regulatory requirements and is correlated with effective VR Counselor-Client relationships and client success. ***USOR defines "client record" as meaning all documentation contained in the Integrated Rehabilitation Information System (IRIS) as well as a supplementary "hard copy" file which contains items that, at present, are not included in the electronic client record in IRIS. USOR considers the electronic client record in the IRIS system to be the "PRIMARY" client record and the supporting paper client record to be "SECONDARY" in nature. USOR intends to transition to a completely paperless client record as technology and resources allow.***

1. Primary Electronic Client Record (IRIS)

All documents that are created and stored in the IRIS client record that DO NOT require an original VR Counselor and/or Client signature DO NOT need to be printed and filed in the secondary paper client record. This includes client progress notes, email communications, letters (except those excluded in 2.C. below), client record reviews, and annual reviews. Electronic copies of the Eligibility Letter, Initial Interview, Comprehensive Assessment of Rehabilitation Needs, Client Service Recommendations, 90 day Closure Letter, 30 day closure letter, electronic transcripts, financial aid information, and electronically completed forms DO NOT need to be printed once stored in the IRIS system. Any progress report and/or medical/psychological/educational reports that are emailed to the VR Counselor can be cut and pasted into the IRIS electronic client record and do not need to be printed.

2. Secondary Paper Client Record

All material on both sides of the file will be in reverse chronological order. If the client's case is being reopened, clearly separate the old client record from the new client record. Each client record must stand complete, if documentation from the old client record is used for eligibility or assessment in the new client record, the older documentation should be photo copied and included with both the older and newer client record. The following originally signed (VR Counselor and/or client) documents must be included in the secondary paper client record: client signed eligibility extension forms, original Individualized Plan for Employment (IPE), all signed IPE Amendments, all signed authorizations, signed Closure Statement and 0 day Closure Letter, all original USOR forms not currently completed in IRIS.

7.5 Organization of USOR Secondary Paper Client Record - Specific - Left Side

- A. Affix documents at the top of the folder.
- B. All items to be filed in reverse chronological order, not by type or form number.
- C. Keep only the most recent 911 on top at all times.
- D. Attach odd-sized documents, e.g., newspaper articles, small papers, to a standard-sized piece of paper (glue, tape, etc) before adding into the client record and date them.
- E. Listed below are the documents to be filed in reverse chronological order on the left side:

1. **Most Recent 911**
2. **Eligibility Extension Forms (Client Signature)**
3. **0 Day Closure Letter**
4. **Progress Reports** (Third Party Non-Electronic: training, therapy, etc.)
5. **Interagency Referrals** (Catholic Services, YCC, Courts, etc)
6. **USOR-45** Information Release Form
7. **USOR-45b** Information Release Form (Special Ed, etc)
8. **USOR-56** Client Publicity Release
9. **USOR-72** On-The-Job Training Report
10. **USOR-84** Letter of Understanding – OJT

7.6 Organization of USOR Secondary Paper Client Record - Specific - Right Side

- A. Affix documents in the left margin.
- B. Keep financial information together with authorization, i.e. authorization adjustment forms, offer to sell, equipment/prosthetic appliance receipts, etc
- C. With the exception of the financial data in B above, the items listed below will be arranged in the order shown:
 1. **USOR-853** Report to SSA
 2. **USOR-5a** Closure Statement (*original filed at Closure*)
 3. **USOR-5c** IPE Amendments
 4. **USOR-5** IPE
 5. **USOR-4** Application
 6. **PELL** Verification/Documentation
 7. **USOR-44** Needs Analysis Request/Report
 8. **USOR-48** Determination of Need for Financial Supplementation
 9. **USOR-4a** Confidential Report of Financial Circumstances
 10. **USOR-23** Authorization & Billing for Services (*reverse chronological*)
 11. **USOR-51** Offer to Sell
 12. **USOR-51a** Offer to Sell – Hearing Aid
 13. **USOR-52** Physical Restoration Checklist
 14. **USOR-53** Equipment Receipt
 15. **USOR-54** Prosthetic Appliance Receipt
 16. **USOR-67** Property Accountability Record
 17. **USOR-34** Blood Letter
 18. **USOR-33** Responsibility Release for Physical Restoration
 19. **USOR-31** Disability Consultation (green sheet) [*optional*]
 20. **Non-Electronic Medical Reports/Evaluations** (reverse chronological)
 - a. **USOR-3** Basic Medical Examination Report
 - b. **USOR-3C** Visual Disability Examination Report
 - c. **USOR-3D** Medical Report, Hearing Disability
 - d. **USOR-3E** Dental Examination Report
 - e. Specialists' Exams
 - f. Psychiatric and Psychological Exams
 21. **High School Transcripts**
 22. **Test Scores/Materials/Vocational Evaluation**
 23. **Social Security Verification and/or correspondence NOT already in IRIS.**